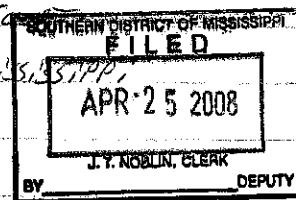


1 OF 4
JCS

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION



GREGORY BUTLER #00183
PLAINTIFF

-VS-

CHRISTOPHER EPPS, Commissioner MDOC

AMERICAN CORRECTIONAL ASSOCIATION

GIT ENTERPRISE OF MS INC
DEFENDANTS

Does 1-20

Case No. 3:08cv268 TSL-JCS

42 U.S.C. 1983 Tury Trial Demand

1. Personal Injury

2. Violation of State Laws on Smoking

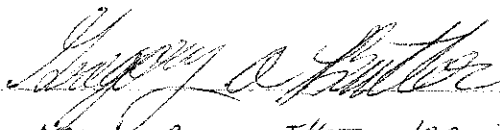
3. Violation of ACA Standards

4. Violation of Constitutional Rights

PLAINTIFF GREGORY BUTLER #00183 A RESIDENT OF THE STATE
OF MISSISSIPPI, PRESENTLY IS INCARCERATED IN A STATE PRISON, SOUTHERN
MISSISSIPPI CORRECTIONAL INSTITUTION LOCATED AT P.O. BOX 144 LEXESVILLE
MS, 39451. PLAINTIFF HAS NOT FILED ANY PETITIONS FOR HABEAS
CORPUS RELIEF PURSUANT TO 28 USC § 2254 OR ANY 42 USC § 1983.
EVEN IN THE PAST, NOTHING DISMISSED OR DROPPED.

CHRISTOPHER EPPS, COMMISSIONER OF (MDOC) MISSISSIPPI DEPARTMENT OF
CORRECTIONS, IS SUED IN HIS OFFICIAL AND SUPERVISORY CAPACITY. HE SET
IN MOTION A SERIES OF EVENTS HE NEW ABOUT OR SHOULD HAVE
KNOWN ABOUT THAT LED TO MY INJURIES AND DAMAGES. LOCATED AT
723 NORTH PRESIDENT STREET, JACKSON, MS 39202.
AMERICAN CORRECTIONAL ASSOCIATION, LOCATED AT 4380 FORBES BLVD.
LANTHAM, MARYLAND 20706, ALSO AS A ASSOCIATION ASSOCIATION FOR
MDOC, IN MISSISSIPPI DOING BUSINESS THERE ALSO LOCATED AT 723 NORTH
PRESIDENT STREET, JACKSON, MS 39202, IS SUED IN ITS OFFICIAL AND
SUPERVISORY CAPACITY. SET IN MOTION A SERIES OF EVENTS THEY

Gregory Butler

20F4
545


1 NEW ABOUT OR SHOULD NEW ABOUT THAT LED TO MY
2 INJURIES AND DAMAGES.

3
4 GIT ENTERPRISE OF MS INC, LOCATED AT P.O. BOX 1779
5 BRANSON, MS 39043 AND AS A VENDOR DURING DATES OF EVENTS
6 OF THIS CLAIM WAS ALSO LOCATED AT 723 NORTH PRESIDENT STREET
7 JACKSON, MS 39202 IS SUED IN ITS OFFICIAL AND SUPERVISORY
8 CAPACITY SET IN MOTION A SERIES OF EVENTS THEY NEW ABOUT
9 OR SHOULD HAVE KNOWN ABOUT THAT LED TO MY INJURIES AND DAMAGES.

11 ISSUE PROCESS

12 PLAINTIFF ASK FOR THE UNITED STATES MARSHAL TO SERVE
13 SUMMONS AND COMPLAINT AND FOR THE CLERK TO ISSUE SAME.

14
15 DOES 1-20 PROPER IDENTITIES ARE NOT YET KNOWN BUT RESERVE
16 THE RIGHT TO NAME THEM ASK THEY BECOME KNOWN.

17
18 CHRISTOPHER EPPS, AMERICAN CORRECTIONAL ASSOCIATION AND GIT ENTERPRISE
19 OF MS INC HAVE ALL STRICTLY FOR PROFIT IGNORED AND BROKE WELL
20 ESTABLISHED STATE LAWS AND ACCREDITATIONAL POLICIES. PLAINTIFF

21 IN 2004 MADE IT KNOWN TO PRISON OFFICIALS HE WAS HAVING PAIN
22 IN HIS LUNGS AND IT WAS DETERMINED THEN IT WAS DO TO HIS SMOKING
23 HABIT. HE REQUESTED HELP BY WAY OF MEDICAL INTERVENTION

24 AND AN EDUCATIONAL LITERATURE BUT WAS DENIED AND TOLD

25 THE ONLY POLICY ON SMOKING WAS THAT OF 1998 ACA

26 STANDARD. DEFENDANTS WITHHELD THE 2004 POLICY WHICH

27 WOULD HAVE FORCED HIM TO STOP SMOKING IN HOUSING UNITS

28 WHICH IS WHERE HE IS LOCKED DOWN 23 HOURS A DAY AND

IT WOULD HAVE GIVEN HIM EDUCATIONAL MATERIALS TO ASSIST

HIM. INSTEAD DEFENDANTS KEPT MAKING MONEY BY SELLING

TABACCO PRODUCTS AND MAKING A WAY FOR HIM TO USE IT

UNLAWFULLY WITH OUT HIS KNOWLEDGE. THEY CAUSED MY INJURIES.

3 of 4
JMS

1

FIRST Cause OF ACTION

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Personal Injury

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ALL DEFENDANTS IN THIS COMPLAINT CAUSE MEDICALLY DOCUMENTED INJURIES ON PLAINTIFF DO TO HIS SMOKING, HEADACHES, CESS APLY, LONG DISEASE IS AMONG SOME OF THEM.

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SECOND Cause OF ACTION

8

Violation ON STATE LAWS ON SMOKING

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STATE LAW REQUIRE NO SMOKING IN A STATE BUILDING AND DEFENDANTS IGNORED THEM TAKING AWAY MY CHANCE TO QUIT SMOKING AND FURTHERING MY DAMAGES AND INJURIES.

13

THIRD Cause OF ACTION ACA STANDARDS

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DEFENDANTS VIOLATE ACA STANDARDS ON USE OF TOBACCO. THEY IMPLIMENT A 1998 STANDARD THAT WAS CLEARLY REPLACED IN 2004. THE ACA ITS SELF IGNORE THIS AND OTHER VIOLATIONS AND ALLOW THE VIOLATIONS, GIVING THE INSTITUTION A PASSING GRADE REACCREDITING THEM. THIS IS A VIOLATION OF THERE TAX EXEMPT STATUS, FINANCIAL AND OTHER ILLEGAL ACTS TO BE INVESTIGATED. AS THEY HAVE ALLOWED MORE VIOLATIONS HERE OTHER PLACES ACROSS THE COUNTRY WILL SHOW THE SAME.

23

FOURTH Cause OF ACTION

24

Violation OF CONSTITUTIONAL RIGHTS

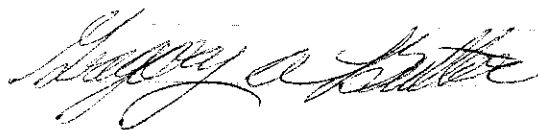
25

26

27

28

THE EIGHTH AMENDMENT DELIBERATE ENDERFERENCE HAS WELL ESTABLISHED CASES ABOUT THIS ISSUE ON SMOKING. DEFENDANTS VIOLATED THIS.



4 of 4
5/15

ADMINISTRATIVE REMEDYS

ADP WAS FILED AND ALL STATUTE OF LIMITATIONS WAS VIOLATED AS MDOC HAS IGNORED OTHER ADPS ON THIS SUBJECT MATTER, CASE NO. (SMCI-08-09) AND OTHERS. THE COURT IS MY ONLY RECOURSE AND MY HEALTH IS IN IMMINENT DANGER.

RELIEF

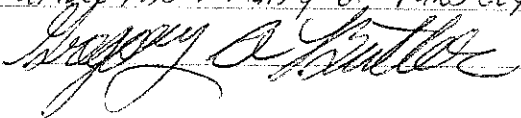
FOR ALL POLICYS ON NO SMOKING TO BE GRANTED AND EDUCATIONAL MATERIAL PASSED OUT TO ALL INMATES ON WAYS TO STOP SMOKING AS STATED IN ACA STANDARD, USE OF TOBACCO

\$1,000,000 (ONE million) FOR ACTUAL DAMAGES.

\$5,000,000 (FIVE million) FOR PUNITIVE DAMAGES

ALL COST FOR THIS ACTION TO BE BROUGHT BEFORE THIS COURT.

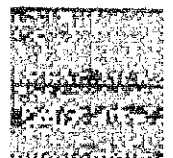
I UNDER THE PENALTY OF PERJURY DECLARE ALL IS TRUE.



Erasmus Butler #00183
E-1 Bed 114 SMC I
P.O. Box 1419
Leakesville, MS 39451

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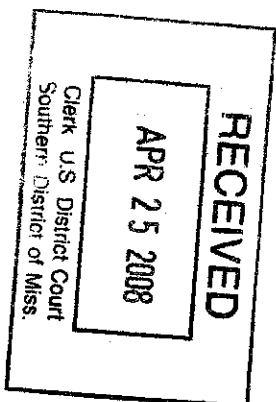
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SOUTH DISTRICT OF MISSISSIPPI
JACKSON, MS 39201



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